



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, NY 10007

May 30, 2025

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State*, No. 23 Civ. 02513 (AKH)

Dear Judge Hellerstein:

We write on behalf of Defendant the United States Department of State (the “State Department” or the “Government”) and Plaintiff the Knight First Amendment Institute at Columbia University (the “Institute”) to provide a status update in the above-referenced Freedom of Information Act (“FOIA”) lawsuit.

As the parties advised in their prior joint status reports, the State Department has completed its processing of records in response to the Institute’s FOIA request and Plaintiff requested additional information about certain withholdings. *See* ECF Nos. 32, 34. Since the filing of the last report, the Government has provided Plaintiff with a draft *Vaughn* index for the withholdings identified by Plaintiff, and has re-produced a number of records with certain redactions removed. Plaintiff is in the process of reviewing the materials provided. The parties propose filing the next status report by June 30, 2025, to advise the Court as to whether any issues remain for the parties or the Court to resolve.

We thank the Court for its attention to this matter.

Respectfully,

JAY CLAYTON
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2748
dominika.tarczynska@usdoj.gov

cc: Jennifer Jones (via ECF)
Alexander Abraham Abdo (via ECF)
Attorneys for Plaintiff